

HEATHER E. WILLIAMS, SBN #122664  
Federal Defender  
HANNAH LABAREE, # 294338  
Assistant Federal Defender  
801 I Street, 3<sup>rd</sup> Floor  
Sacramento, CA 95814  
Tel: 916-498-5700/Fax 916-498-5710  
Attorneys for Defendant  
ROBERT ALLEN POOLEY

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	)	Case No. 2:21-cr-00111-WBS-1
	)	
Plaintiff,	)	STIPULATION AND PROPOSED ORDER TO
	)	CONTINUE STATUS CONFERENCE, AND TO
vs.	)	EXCLUDE TIME
	)	
ROBERT ALLEN POOLEY	)	Date: February 13, 2023
	)	Time: 9:00 a.m.
Defendant.	)	Judge: Hon. William B. Shubb
	)	

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IT IS HEREBY STIPULATED by and between the parties hereto through their respective counsel, Acting United States Attorney Phillip Talbert, through Assistant United States Attornies Christopher Stanton Hales and Katherine Theresa Lydon, attorneys for Plaintiff, and Federal Defender Heather Williams, through Assistant Federal Defender Hannah Labaree, attorney for defendant Robert Allen Pooley, that the previously-scheduled status conference date of December 12, 2022, be vacated and the matter be set for status conference on February 13, 2023 at 9:00 a.m, at the defendant's request.

To date, the government has produced over 19,000 individual Bates-stamped items, with additional discovery amounting to over 6 terabytes of data available for further production and inspection. Counsel for the defendant requires time to review discovery, conduct independent investigation, and meet with her client to review the material.

1 For all these reasons, Defense counsel believe that the failure to grant the above-  
2 requested continuance would deny them the reasonable time necessary for effective preparation,  
3 taking into account the exercise of due diligence.

4 Based upon the foregoing, the parties agree time under the Speedy Trial Act should be  
5 excluded from this order's date through and including December 5, 2022, pursuant to 18 U.S.C.  
6 §3161 (h)(7)(A)and (B)(iv) (reasonable time to prepare), and General Order 479, Local Code T4,  
7 based upon continuity of counsel and defense preparation.

8 Counsel and the defendant also agree that the ends of justice served by the Court granting  
9 this continuance outweigh the best interests of the public and the defendant in a speedy trial.

10 Respectfully submitted,

11 Dated: December 7, 2022

HEATHER E. WILLIAMS  
Federal Defender

12  
13 /s/ Hannah Labaree  
HANNAH LABAREE  
Assistant Federal Defender  
Attorney for Defendant  
14 ROBERT ALLEN POOLEY  
15

16 Dated: December 7, 2022

PHILLIP A. TALBERT  
United States Attorney

17  
18 /s/Christopher Stanton Hales  
CHRISTOPHER STANTON HALES  
Assistant U.S. Attorney  
19 Attorney for Plaintiff  
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ORDER

IT IS HEREBY ORDERED, the Court, having received, read, and considered the parties' stipulation, and good cause appearing therefore, adopts the parties' stipulation in its entirety as its Order. The Court specifically finds the failure to grant a continuance in this case would deny counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence. The Court finds the ends of justice are served by granting the requested continuance and outweigh the best interests of the public and defendant in a speedy trial.

The Court orders the time from the date of this order, up to and including February 13, 2023, shall be excluded from computation of time within which the trial of this case must be commenced under the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)(A) and(B)(iv) [reasonable time for counsel to prepare] and General Order 479, (Local Code T4). It is further ordered the December 12, 2022 status conference shall be continued until February 13, 2023, at 9:00 a.m.

Dated: December , 2022

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Hon. William B. Shubb  
United States District Judge